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10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 **KATHERINE SEARS AND VIRGINIA**  
13 **SEGANOS**, individually, and on behalf of  
14 others similarly situated,

15 Plaintiffs,

16 vs.

17 **MID VALLEY ENTERPRISES, LLC** and  
18 **PAHRUMP ICS LLC**, doing business as  
19 **“SHERI’S RANCH”**.

20 Defendants.

Case: 2:19-cv-00532-APG-DJA

21 **JOINT STIPULATION AND ORDER TO**  
22 **EXTEND CASE MANAGEMENT**  
23 **DEADLINES DUE TO SETTLEMENT IN**  
24 **PRINCIPLE**

25 *(Fourth Request)*

26 Plaintiffs Katherine Sears and Virginia Seganos on behalf of themselves and all persons who  
27 have opted in to this action (collectively “Plaintiffs”), and Defendant Mid Valley Enterprises, LLC  
28 and Pahrump ICS LLC (collectively “Defendants”), hereby notify the Court that they have reached  
a settlement in principle to resolve this action in its entirety, and pursuant to LR IA 6-1, hereby  
stipulate and agree to amend the deadlines for filing their respective dispositive motions from  
January 10, 2023 to February 24, 2023, with Responses due on March 24, 2023 and Replies due on  
April 21, 2023, for good cause shown, aver as follows:

1. On August 31, 2022, the Court granted the parties’ third Joint Stipulation and Order  
to extend case management deadlines, and extended the deadline for dispositive motion from  
September 5, 2022 to January 10, 2023, to allow the parties time to attempt mediation before filing  
their respective motions for summary judgment. *See* ECF No. 105.

2. On November 3, 2022, the parties participated in a mediation with Hon. Peggy A. Leen (Ret.), JAMS Mediator and Arbitrator. The parties did not reach a settlement at the mediation, but through continued discussions, did reach a settlement in principle on December 13, 2022, which will resolve this action in its entirety and avoid the need for either side to move for summary judgment. Defendants' counsel is preparing the draft of the settlement agreement and intends to circulate it for Plaintiffs' counsel's review by January 12, 2023.

3. There is good cause to extend the time for filing dispositive motions to February 24, 2023, with Responses due on March 24, 2023 and Replies due on April 21, 2023, as the extension would enable the parties to finalize and execute a long-form settlement and file documents to effectuate the dismissal of this action, and then adequately prepare their dispositive motions, in the event the parties are unable to consummate their settlement.

4. This is the Parties' fourth request to extend the case management deadlines, including those for filing any dispositive motions.

5. This Stipulation is made in good faith and is not intended for purposes of delay.

STIPULATED BY THE PARTIES:

DATED this 9<sup>th</sup> day of January, 2023.

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IT IS SO ORDERED.

DATED: January 10, 2023

By: 

DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE